

1
2 UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF CALIFORNIA

4 -----x

5 IN RE: FACEBOOK, INC. CONSUMER
6 PRIVACY USER PROFILE LITIGATION

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This document relates to:

7 ALL ACTIONS.

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8
9 December 10, 2021

10 12:08 p.m.

11 CONFIDENTIAL

12 PURSUANT TO PROTECTIVE ORDER

13 Remote Video Zoom Deposition of CHERYL
14 SENKO, taken by Plaintiff, pursuant to Notice,
15 with the Witness located in Parma, Ohio, before
16 William Visconti, a Shorthand Reporter and
17 Notary Public within and for the State of New
18 York.
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1 CHERYL SENKO - CONFIDENTIAL

2 Facebook platform. I believe they violated my
3 privacy when they share my personal data with
4 Cambridge Analytical, a third-party app who did
5 I don't know what they did with it. I believe
6 they violated my peace because I was harassed
7 during the 2016 election by things that came in
8 my news feed and bullied. I believe that they
9 caused me potential financial harm because they
10 put me at risk for identity theft and other
11 harms that way and I don't know how else they
12 have harmed me because they haven't told us
13 yet.

14 Q. Miss Senko, do you have any notes
15 or other material with you today either on your
16 computer or otherwise?

17 A. I do not.

18 Q. You're not reading from anything?

19 A. I'm not.

20 Q. You say that you believe Facebook
21 violated you privacy by sharing your
22 information off of the Facebook platform. What
23 do you believe they shared?

24 A. I don't know, because they haven't
25 told me. But I'm guessing it was political

1 CHERYL SENKO - CONFIDENTIAL

2 beliefs, religious beliefs, contact
3 information. I don't know what else.

4 Q. So you just think they did that?

5 A. Yes. Well they told me they did
6 when they told me about the Cambridge Analytica
7 breach.

8 Q. What did they --

9 A. Sorry, I didn't mean to overtalk.

10 Q. Do you believe that Facebook told
11 you that Facebook violated your privacy?

12 A. They told me I was part of the
13 Cambridge Analytica data sharing. They
14 violated my privacy.

15 Q. That Cambridge Analytica violated
16 your privacy?

17 A. They both did. Cambridge
18 Analytica paid, what was it, \$100 million to
19 Facebook for the privilege of violating my
20 privacy and who knows how many others, so they
21 both did.

22 Q. When you're referring to Cambridge
23 Analytica, what do you understand Cambridge
24 Analytica to be?

25 A. Are they a political consultant